



Michael J. Schwab,
Counsel
Direct Dial: (212) 239-5527
Email: mschwab@moritthock.com

January 12, 2021

VIA ECF

The Honorable Steven I. Locke
United States Magistrate Judge
Eastern District of New York
100 Federal Plaza, Courtroom 840
Central Islip, New York 11722-9014

**Re: *Purvis et al. v. Golden Bell et al.*, Case No. 2:20-cv-00639-GRB-SIL
Parties' Joint Status Update Regarding Mediation and Discovery**

Dear Magistrate Judge Locke,

This firm represents the defendants in this matter. We, along with Plaintiffs, are submitting this joint letter to provide an update on discovery progress and settlement negotiations, including a request that Your Honor adjourn the discovery deadlines set forth in the November 18, 2020, discovery order.

As previously advised this case was referred to mediation pursuant to The Honorable Judge Gary R. Brown's order, dated June 11, 2020 [ECF Doc. No. 22] and mediation sessions were held with Mr. Noah Hanft on September 22, 2020 and October 8, 2020, and the parties engaged in additional settlement discussion thereafter and through the holidays. .

Running parallel to the settlement talks, the parties have been engaging in discovery and efforts to resolve discovery disputes. Each party has produced responsive documents, but each party maintains that there is still discovery outstanding and are seeking to resolve these issues. Also, Plaintiffs served additional document demands on November 25, 2020, to which Defendants' provided written responses on December 28, 2020. Defendants are continuing to review their records in efforts to identify and produce documents responsive to these demands.

In order for the parties to complete paper and electronic discovery, with minimal diversion of this Court's time and resources absent the need for a motion to compel, the parties respectfully propose the following revised discovery schedule:

March 5, 2021 : Completion of paper and electronic discovery.

Honorable Steven I. Locke
January 5, 2021
Page 2

April 9, 2021	:	Completion of depositions
April 28, 2021	:	Identification of case-in-chief experts and service of Rule 26 disclosures
May 14, 2021	:	Identification of rebuttal experts and service of Rule 26d disclosures
June 11, 2021	:	Commencement of summary judgment motion practice

The parties defer to the Court's discretion in selecting the dates for an adjourned status conference and pretrial conference.

/s/ Francelina M. Perdomo
Francelina M. Perdomo
Attorney for Plaintiffs

/s/ Michael J. Schwab
Michael J. Schwab
Attorney for Defendants